

REMARKS/ARGUMENTS

Claims 1-31 remain in the application. Claims 1 and 9 are amended to clarify the subject matter of applicant's invention.

A. Rejections under 35 U.S.C. 102.

Claims 1-6, 8-12 and 14-31 were rejected under 35 U.S.C. 102 based upon U.S. Patent 6,078,582 to Curry et al. This rejection is respectfully traversed.

Claim 1 calls for, among other things, encoding data traffic over the communication channel in a first process in the front-end computer and encoding data traffic over the communication channel in a second process in the back-end computer, wherein the first process and the second process implement compatible semantics. At least these features of claim 1 are not shown or suggested in the relied on reference.

Claim 1, as amended, specifies that the front-end and back-end computers implement web servers. Curry does not show or suggest the use of web servers in the first and second telephony servers. It also should be noted that claim 1 also calls for a front-end computer having an interface for communicating data traffic with a first computer, and a back-end computer having an interface for communicating data traffic with the second computer. Curry et al. deal with communication between a called party and a calling party, not first and second computers. Hence, the telephony servers in Curry require interfaces for communicating with telephone equipment, not computers.

For at least these reasons claim 1 is not shown or fairly suggested by Curry. Claims 2-8 that depend from claim 1 are allowable for at least the same reasons as claim 1 as well as for the limitations appearing in those claims.

Claim 9, as amended, calls for a front-end web server and a back-end web server within a network. Curry does not show or suggest the use of web servers. Note that the Office action states that a web server is shown at col. 4,

lines 24-30 in Curry, but after reviewing that citation, and the remainder of the Curry reference, no indication of a web server has been found. For at least these reasons claim 9 is not anticipated nor made obvious by Curry et al.

Claims 10-14 that depend from claim 9 are believed to be allowable over Curry et al. for at least the same reasons as claim 9, as well as the individual limitations appearing in those claims.

Claim 15 calls for, among other things, a plurality of network-connected applications generating requests for network services and a plurality of network-connected computers configured to provide services in response to received requests. Curry shows calling parties that place "call requests". The calling parties are not fairly equivalent to network connected applications or network connected computers set out in claim 15. Moreover, the telephony servers in Curry et al. do not include interfaces configured in the manner called for in claim 15 because the telephony servers do not have any need to communicate with network connected computers and/or applications. For at least these reasons claim 15 and claim 16 are allowable over Curry et al.

Claims 17 and 18 call for a plurality of client applications generating requests for network services. In Curry et al. call requests are initiated by people, and routing requests are initiated from one of the telephony servers in response to a call request. There does not appear to be any client applications generating requests. Moreover, there are no front end web servers and/or back-end web servers mentioned in Curry et al.

Additionally, claim 18 calls for a one-to-many communication channel through the network. Curry et al. appear to involve only one-to-one communication channels in the network. Accordingly, this element of claim 18 is not shown or suggested in the relied on reference.

Claim 19 calls for a blender operable to multiplex the data from a plurality of data transport links into a shared-bandwidth channel. Curry shows

establishing dedicated virtual paths, not shared bandwidth channels as called for in claim 19. By reserving bandwidth for each channel Curry ensures that sufficient bandwidth will exist but must establish and manage each virtual channel separately. The shared bandwidth channel of claim 19 provides a different solution. Further, because the virtual channels in Curry et al. are distinct, there is no need for the blender of claim 19. The virtual channels remain intentionally distinct and no blending is necessary or permissible.

For at least these reasons claim 19 and claims 20-30 that depend from claim 19 are believed to be allowable over Curry.

Independent claim 31 calls for a blender in combination with means for applying rate control. As noted with respect to claim 19, Curry uses dedicated virtual channels and so does not need to blend data from a plurality of data transport links. Each link presumably gets its own virtual channel in Curry. Moreover, Curry is clear that rate control is applied on a per-virtual channel basis and not aggregated across all of the plurality of data transport links. For at least these reasons claim 31 is allowable over the relied on references.

B. Rejections under 35 U.S.C. 103.

Claims 7 and 13 were rejected under 35 U.S.C. 103 based upon Curry et al. in view of Aziz et al. This rejection is respectfully traversed.

Claims 7 and 13 are distinct with respect to Curry for at least the same reasons as claims 1 and 9, respectively, from which they depend. Aziz does not supply the deficiencies of Curry et al. that have been set out above.

C. Conclusion.

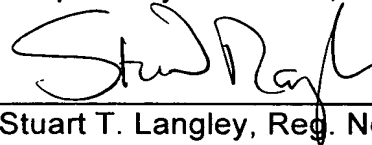
The references that were cited but not relied upon are no more relevant than the references that were relied upon. In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner

is requested to contact Applicants' attorney at the telephone number listed below.

This response is filed together with a request for a three month extension of time and the required fee of \$510 for a small entity. Any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

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Respectfully submitted,



Stuart T. Langley, Reg. No. 33,940
Hogan & Hartson LLP
One Tabor Center
1200 17th Street, Suite 1500
Denver, Colorado 80202
(720) 406-5335 Tel
(303) 899-7333 Fax